

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

JENNAYA BENNETT-WERRA,)
Plaintiff,)
)
 v.)
)
 STEVEN TOMPKINS, et al.,)
Defendants.)

Civil Action No. 1:20-cv-10017-ADB

MOTION TO ENLARGE BY DEFENDANT NAPHCARE, INC.

Defendant NaphCare, Inc., respectfully requests that the time for responding to the Complaint be enlarged up to and including **June 30, 2020**. As reason therefore, Defendant NaphCare, Inc. states that this case was just assigned to the undersigned Counsel, and Counsel requires additional time to investigate the facts and make an informed and intelligent response to the allegations of the Complaint.

Respectfully submitted,

Defendant NaphCare, Inc.,

By its attorney,

/s/ William D. Saltzman
William D. Saltzman, BBO #439749
KOUFMAN & FREDERICK, LLP
145 Tremont Street, 4th Floor
Boston, MA 02111
(617) 423-2212
ws@kflitigators.com

Dated: May 21, 2020

CERTIFICATE OF SERVICE

I, William D. Saltzman, certify that on the 21st day of May, 2020, a copy of the above pleading was filed with the ECF System and sent electronically to the registered participants identified on the Notice of Electronic Filing, with paper copies being sent to those indicated as non-registered participants.

/s/ William D. Saltzman
William D. Saltzman